## Exhibit 4

**Anderson Declaration** 

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:	)	Case No. 12-12020 (MG)
RESIDENTIAL CAPITAL, LLC, et al.,	)	Chapter 11
Debtors.	) )	Jointly Administered

## DECLARATION OF KEITH ANDERSON IN SUPPORT OF THE RESCAP BORROWER CLAIMS TRUST'S OBJECTION TO CLAIM NO. 2130 FILED BY FREDERIC L. EDQUID AND LESLEY H. EDQUID

- I, Keith Anderson, hereby declare as follows:
- 1. I am a member of the Bars of the States of Alabama, Georgia, Minnesota, Ohio and Texas, and have been admitted to practice before this Court *pro hac vice*. I represent Debtors GMAC Mortgage and Executive Trustee Services, LLC in connection with an action brought by claimants Frederic L. Edquid ("Edquid") and Lesley H. Edquid (together with Edquid, the "Claimants") and pending in the United States District Court for the District of Arizona, Case No. 11-311 (TCC) (CKJ) (the "District Court Action"). I submit this declaration (the "Declaration") in support of the *Rescap Borrower Claims Trust's Objection to Claim No.* 2130 Filed by Frederic L. Edquid and Lesley H. Edquid (the "Objection").
- 2. Attached hereto as <u>Exhibit A</u> is a true and correct copy of a transcript of the deposition that I administered to Edquid in connection with the District Court Action.
- 3. Attached hereto as Exhibits B F are true and correct copies of five correspondences produced by Claimants during discovery in the District Court Action.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Capitalized terms not defined herein shall have the meanings ascribed to them in the Objection.

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Dated: October 1, 2015

/s/ Keith Anderson
Keith Anderson